



OFFICE OF THE PROSECUTING ATTORNEY
24TH JUDICIAL CIRCUIT
HAMILTON COUNTY, INDIANA

PRESS RELEASE

Friday, February 1, 2013

An investigation conducted by the Carmel Police Department led to the filing of a charge of Conspiracy to Commit Murder, a Class A Felony, against a Stephen A. Perry.

The charge, filed on December 31, 2012, is pending in Hamilton Superior Court III in Noblesville under cause number 29D03-1212-FA-011444. A jury trial date has been scheduled for June 4, 2013 with pretrial conferences set for March 12th and May 6th.

Mr. Perry was arrested by officers of the Carmel Police Department on December 31st, and he remains held at the Hamilton County Jail.

The fact that a defendant has been charged with a crime is merely an accusation, and the defendant is presumed innocent until and unless proven guilty.

Further inquiries about the litigation may be directed to Chief Deputy Prosecuting Attorney Andre Miksha. Due to a recent influx of inquiries by the media, the State provides this release and copy of the charging information and the probable cause affidavit is attached for your reference.

* * *

IN THE HAMILTON CIRCUIT/SUPERIOR COURTS

STATE OF INDIANA)
) SS:
COUNTY OF HAMILTON)

CAUSE NO. 29

STATE OF INDIANA

AMENDED INFORMATION FOR:

VS.

STEPHEN A. PERRY
8038 Charlecot Drive
Indianapolis, IN 46268

Count 1:
Conspiracy to Commit Murder
I.C. 35-42-1-1(1) and I.C. 35-41-5-2
a Class A Felony

OLN: 2271-16-1588 Indiana
DOB: 7/29/1985
SSN: XXX-XX-5101

PHYSICAL DESCRIPTION

Race: W Sex: Male
Height: 5'09" Weight: 235
Eyes: Blue Hair: Brown

FILED
(MAG)

JAN 02 2013

Patty Beamer
CLERK OF THE
HAMILTON SUPERIOR COURT

BE IT REMEMBERED,

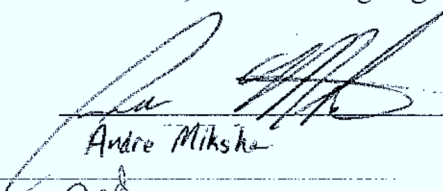
That on this day comes *Andre Miksha*, who being duly sworn upon his oath, says that in the County of Hamilton, State of Indiana,

Amended Count 1: on or between November 1, 2012 and December 22, 2012 Stephen A. Perry did, with the intent to commit the felony of Murder, agree with another person or persons to commit said crime of Murder and in furtherance of said agreement, Stephen A. Perry or did commit one or more of the following overt acts:

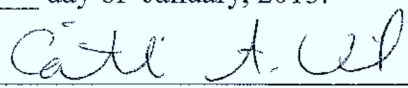
- a.) approached co-worker Adrian Howard on multiple occasions asking if "he (Adrian Howard) knew someone that would kill someone",
- b.) offered to pay Adrian Howard in cash or other property if Adrian Howard would kill Stephen Perry's estranged wife, Allison Mayer
- c.) gave Adrian Howard information regarding the residents of the home occupied by Allison Mayer, as well as information regarding property in the house;
- d.) established a timeline for when he wanted Adrian Howard or an agent thereof to commit the crime.

All of which is contrary to the form of the statute of such case made and provided, and against the peace and dignity of the State of Indiana.

I affirm, under penalty of perjury as specified by IC 35-44.1-2-1, that the foregoing representations are true.


Andre Miksha

Approved by me this 2nd day of January, 2013.


Deputy Prosecuting Attorney

IN THE HAMILTON CIRCUIT/SUPERIOR COURT
STATE OF INDIANA

STATE OF INDIANA

V.

CAUSE NO. _____

STEPHEN A. PERRY

AFFIDAVIT FOR PROBABLE CAUSE

Comes now Detective James Grose of the Carmel Police Department, who hereby swears upon oath, deposes and says:

I am filing this affidavit for probable cause in support of the charge of conspiracy to commit murder against Stephen A. Perry, a white male, DOB: 7-29-1985, ID/OLN: [REDACTED] -State: IN, height 5'9", weight 235 lbs., with brown hair and blue eyes, last known address: 8038 Charlecot Drive, Indianapolis, IN 46268.

On December 29, 2012 Allison Mayer filed a report with Officer Matthew Broadnax of the Carmel Police Department regarding a threat made against her life. Ms. Mayer said earlier that day she received a message from someone that identified themselves as a co-worker of her husband Stephen Perry and told her there was a recording he wanted her to listen to. The co-worker was later identified as A [REDACTED] H [REDACTED]. Ms. Mayer later met with Mr. H [REDACTED] at Starbucks, 10460 N. Michigan Road, Carmel, IN. During the meeting Mr. H [REDACTED] said Mr. Perry approached him several times at work asking if he would be willing to kill his wife. Mr. H [REDACTED] decided to record a conversation between him and Mr. Perry on December 8, 2012 while at work at [REDACTED] Carmel, Hamilton County, Indiana. Mr. H [REDACTED] gave Ms. Mayer his cellular telephone that contained the recording. Ms. Mayer identified the voice of the second person in the recording as Mr. Perry.

I listened to two recordings from the cellular telephone collected from Ms. Mayer. The recordings were saved as files Voice 004.amr and Voice 008.amr. The Voice 004 recording is two minutes and thirty-eight seconds long. During the recording Mr. Perry said "she stole about 15 from me and the Judge said I can only get about 10 of it back. I can only prove she owes me about \$10,000." Mr. H [REDACTED] asked "So what is knocking her out worth?" Mr. Perry then replied "It's gonna get me my damn money. Without the divorce. And then I can get all of my money out." Mr. H [REDACTED] said "That's stupid. That's not even worth it to me." Mr. Perry then replied "Better than waiting until January."

The Voice 008 recording is five minutes long. During the recording Mr. H [REDACTED] said "So let me get this straight." Mr. Perry then said "I'm giving you \$15,000.00 straight up real cash." Mr. H [REDACTED] said he thought he was only going to get ten out of it. Mr. Perry then said "No. If I kill her I get all of it. So I'm willing to forfeit all of that. Cause it isn't even about the damn money. I just want this to be over and done with. So if she dies I can drop the divorce lawsuit, she's dead, and I'm free." Mr. H [REDACTED] said "That ain't what you want man." Mr. Perry responded "That is what I want. I want this bitch done." Mr. Perry then explained he filed for divorce on May 7th and final hearing dates were scheduled but she got continuances.

Mr. H [REDACTED] then said "Where's she at? I know somebody." Mr. Perry said she was in Fishers and Mr. H [REDACTED] asked Mr. Perry to write down her name and address. Mr. H [REDACTED] said "Man you gonna snitch" and Mr. Perry responded "I'm not gonna snitch. I just want her dead." Mr. Perry said "You hurt my dog that's another story. You hurt my dog the deal's off."

Mr. Howard then asked "So fifteen grand and what?" and Mr. Perry responded "the printing press". Mr. H [REDACTED] asked where Mr. Perry got the printing press and he said he made it. He said he engineered it and designed it. He then described how the printing press worked and said he would teach Mr. Perry how to do it.

Mr. H [REDACTED] then asked Mr. Perry what her name was and said Mr. Perry's "handwriting sucks". Mr. Perry said "Do you want me to draw you a map of the house how it's laid out so you don't kill her grandparents just take care of her?" Mr. H [REDACTED] asked Mr. Perry what it said and he said "Allison". Mr. Perry said "You can keep the computers that she has. All three of them. Those are worth about five to seven grand. She's got an iMac 27-inch." Mr. H [REDACTED] said "I don't want no fucking computers, man. I ain't doing this shit. I just know somebody."

Mr. Perry then said "Ok. They can have the computers. There's no alarm system they need to worry about." Mr. H [REDACTED] said "I'm telling you though Stephen umm... once you make a call like this there ain't no turning back on that shit." Mr. Perry responded "I know". Mr. H [REDACTED] said "You don't want that man. That's your life." Mr. Perry then said "Not for much longer it ain't. If this is going to be done tonight I can have cash Monday or Tuesday." Mr. H [REDACTED] said "Give me that address. I'll hold on to that and call some people. Don't be sending me to the joint. I don't know nothin' about it." Mr. Perry then said "I don't want to know who. Alright? And if they can they make it look like an accident. I mean we live in Carmel. So, you know. Black people in Carmel?" The recording then stopped.

On December 30, 2012, Detective Robert Locke and I met with Mr. H [REDACTED]. He advised the following during the interview:

He worked for [REDACTED] for approximately one (1) year and worked at the location near [REDACTED] in Carmel for approximately six (6) months. Sometime around mid-November 2012 a co-worker named Stephen approached him and asked if he knew someone that would kill someone. Mr. H [REDACTED] said Stephen said "Well you're black. I know y'all know people." Mr. H [REDACTED] felt Stephen was inferring that every black people person knew someone that would kill someone. Mr. H [REDACTED] said he thought Stephen was joking when he first brought it up because he did not seem serious but over several weeks Stephen got more in-depth. Stephen told Mr. H [REDACTED] he was going through a divorce and he wanted his ex-wife killed because he would get more money and it would settle the divorce easier.

Mr. H [REDACTED] said on December 8, 2012 Stephen bugged him all day so he recorded two conversations he had with him using his Samsung Dart cellular telephone. Mr. Howard said during the second conversation he and Stephen were alone inside the business. There were no customers and the other employees were on a break. Mr. H [REDACTED] held his cellular telephone in his hand while he and Stephen talked. Mr. H [REDACTED] said during the conversation Stephen offered to pay him \$15,000.00 and give him a "money machine" to print counterfeit money. Mr. H [REDACTED] said Stephen wrote down his ex-wife Allison's name and address on a piece of paper and gave it

to him. Stephen said he wanted it done by the end of the weekend. Mr. H [REDACTED] said he thought Stephen was serious.

Mr. H [REDACTED] said Stephen made little comments since December 8, 2012 stating "You still can get that money", but he brushed them off. Mr. Howard said the last time Stephen made any comments was approximately two weeks ago.

Mr. H [REDACTED] later searched Stephen's ex-wife's name through Google and located a business telephone number for her. He called the telephone number but there was no answer. He then sent a text message that said if the person was Stephen's ex-wife it was very important that she contact him. On December 29, 2012 Mr. H [REDACTED] was contacted by Allison and they made arrangements to meet at the Starbucks located at [REDACTED] Carmel, IN after he got off work. When Mr. H [REDACTED] and Allison met he gave her his cellular phone with the recordings on it. He gave her his phone because he could not send the recordings to her and did not need it because he got a new phone.

Mr. H [REDACTED] described Stephen as being a white male that weighed approximately 250 pounds and had brown hair and blue eyes. Mr. H [REDACTED] identified Mr. Perry's Indiana Bureau of Motor Vehicles photograph as being the person he knew as Stephen.

I showed Mr. H [REDACTED] the black Samsung T-Mobile cellular telephone and he confirmed it was the cellular telephone he gave to Allison. I played the two recordings for Mr. H [REDACTED] and he confirmed they were the recordings he made during conversations with Stephen.

Also on December 30, 2012, Detective Locke and I met with Ms. Mayer. She advised the following during the interview:

She checked her business voicemail yesterday morning. Her business number is through Google Voice. She usually checks it once per week but had not checked it due to the holidays. There was a text message sent on December 9, 2012 from someone wanting to know if she was Stephen's ex-wife and if she was he wanted to get a hold of her because he had something important to tell her. She responded to the text message and told the person to call her. The person responded and asked if she could call him and she did. The person said he worked with Stephen at [REDACTED] on [REDACTED] and had a recording he wanted her to listen to. They later made arrangements to meet at the [REDACTED] at around 2:00 p.m. The person met with her and brought a black cellular telephone with rounded edges and played a recording. Ms. Mayer said the person she met with was a black male and there was a photograph of him on the cellular telephone.

Ms. Mayer said after she met with the man she took the cellular telephone and went to the Carmel Police Department to file a report. She gave the cellular telephone to Officer Broadnax. She said the recording was of her husband Stephen Perry talking about how he was frustrated with the divorce. Stephen offered to pay the person she met with \$15,000 to have someone he knew kill her because if she were dead he would not have to worry about it anymore.

Ms. Mayer explained she and Stephen were together for twelve years. They married on December 12, 2009. She said they are still married but Stephen moved out in March 2012 and filed for divorce in Marion County on May 7, 2012. She said final hearings have been set twice

but she has continued them. She continued a hearing that was set in September 2012 because she felt Stephen purposefully had paperwork sent to an address she did not live at and did not receive the documents. She continued a hearing that was set in late November/early December 2012 because she was in the process of hiring an attorney. She said a final hearing is currently scheduled for January 16, 2013.

Ms. Mayer explained the divorce was complicated because she owns a business, Allison Mayer Photography, and Stephen is in the process of receiving inheritance as a result of his mother's death in October 2011. Ms. Mayer said there are questions as to whether or not the inheritance is marital property. She also explained they have approximately \$200,000 in debt. Approximately \$170,000 is from her college tuition and living expenses, \$7,800 is from a civil judgment related to an apartment they lived in, and the remainder is from credit cards. She explained the decision on the inheritance will affect how much debt each of them are assigned. For example, if Stephen receives the inheritance then he will be assigned more debt because he will have a larger capacity to pay it. Ms. Mayer also said Stephen is under the impression she owes him repayment for the past three years so he is telling people she stole \$15,000 from him and think she should have to pay him. She believes \$7,800 of the amount he is referring to is related to an inheritance payout that was deposited into a joint account and used to pay bills but does not know what the remainder is. Ms. Mayer said she and Stephen cannot agree on how to split the assets so it will be decided during a hearing before a judge.

I asked Ms. Mayer if she thought Stephen was serious about the threat but she said she did not know. She said seven months ago she would not have thought he was serious but he is now she is not sure. She said Stephen is not the same person she knew. He says things she never thought he would say and does things she never thought he would do. He abandoned and walked away from everything he was and everything he believed. He gave up his job and a career he loved, stopped going to church, and stopped being involved with groups of people he was involved with. Ms. Mayer said Stephen was a security officer at The Stratford in Carmel and said he left because he had an affair with someone that worked there. Ms. Mayer said Stephen is a sex addict and they went to counseling for that and marital problems.

I then asked Ms. Mayer about several things Mr. Perry said during the recordings. She confirmed she lived with her grandparents and there was no alarm installed in the house. She said Mr. Perry lived in the house in the past. She also confirmed they had a dog, specifically a 7-year-old Chihuahua-Rat Terrier mix. Ms. Mayer said she bought the dog in 2004 before she and Mr. Perry moved to Boston. She referred to the dog as "our dog" but said she paid for it and her grandparents pay for food and vet bills. Ms. Mayer also confirmed she had three computers inside the house, an iMac, a Mac Mini, and a MacBook Pro. She said the value of the computer was approximately \$5,000.

Ms. Mayer said Stephen has never threatened to kill her; however they have been physically violent with each other in the past. She said Stephen called the Indianapolis Metropolitan Police Department in April 2012 when they lived at 9274 Knightsbridge Lane Apt. A. but was not sure if there was a report or not. She said he called the police so he could get into the apartment but she did not want him there. She said the last communication she received from Stephen was on Christmas Day. She said he commonly sent her text messages but she would only respond by calling and leaving him voicemails. She said she had not talked to him or seen him since July or

August. None of the communication from Stephen was threatening. Ms. Mayer said Stephen has a firearms permit and owned .40 caliber Beretta and 9mm Highpoint handguns.

I hereby swear or affirm under the penalty of perjury pursuant to IC 35-44.1-2-1 that the foregoing representations are true to the best of my knowledge and belief.

Dated this 31st day of December, 2012.

 #2355

Detective James Grose
Carmel Police Department